PaThilmany

August 24, 2012

Mr. Matt Hostak Air Engineer Department of Natural Resources 625 E. County Road Y Suite 700 Oshkosh, Wisconsin 54901-9731

RE: 1st Half 2012 Title V Permit Summary Monitoring Report Reporting Period: January 1- June 30, 2012

Dear Matt:

This report is a summary of the compliance status of the monitoring requirements in the Title V Operation Permit 445031180-P12 for the reporting period January 1-June 30, 2012. The permit page numbers and permit references refer to the current permit in effect. Any deviations from permit conditions or excess emissions during this reporting period are summarized in **Appendix A** attached.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,

Thomas G. Javne

Manager, Environmental Services

Steve Myers Mill Manager

EXP_000227

	1st Half 2			onitoring Report
	ļ	Thilmany, LLC	Kaukauna, WI	<u>' </u>
	L			
Permit N		Permit No. 4450		
Reportir	ng Period:	January 1, 2012	2 - June 30, 201	012
Permit Re	ference	Complian	ce (in or Out)	Monitoring Range if applicable
page 9				
A.1.b.(3)		ln	 	monitored in PI
page 10			<u> </u>	
A.1.c.(5) A.3.a.(2)	ļ	In In	 	monitored in PI No. 6 fuel oil ranged from 1.185 - 1.729 % S
A.J.a.(2)		<u> </u>		No. 0 ladi di Tangea il di il 1.103 - 1.723 % 0
page 11		ļ		SO2 emissions ranged from .07 pounds/hr;24 hr ave
A.3.b.(1)		in	1	SOZ emissions ranged from .o7 podrids/mi, 24 fili ave
page 12	<u> </u>			
A.5.c.(1)		In	 	No alternative fuels used in the boiler during the reporting period
page 13				
B.1.b.(3) B.1.c.(2)	<u> </u>	in in	-	recorded on Power Boiler Emission Control Checklist recorded on General Utilities Fuel Distribution Report
B.1.c.(4)	<u> </u>	In	<u> </u>	recorded on Power Boiler Emission Control Checklist
nago 15	ļ	ļ	<u> </u>	
page 15 B.1.c.(9)		In	<u> </u>	monitored in PI
B.2 c.(2)		ln In		Submitted 1st and 2nd Q 2012 EE Reports
page 16	<u>. </u>		 	
B.3.c.(2)		<u>ļn</u>		SO2 emissions range from 3.47-4.90 lbs.SO2/MMBTU;24 hour ave
B.3.c.(3) B.3.a.(3)	ļ	ln ln		and 683-2082 lbs. SO2/hr; 24 hr ave. No. 6 fuel oil ranged from 1.185 - 1.729 % S
		<u> </u>	<u> </u>	I I I I I I I I I I I I I I I I I I I
page 17 B.5.c.(2)	ļ		 	SO2 emissions ranged from 4155-4945 lbs./month;12 mo rolling ave.
B.5.c.(3)	 	In		302 emissions ranged nom 4100-1943 tos, month, 12 mo ronning ave.
B.5.c.(4)		In		
page 18	 	 	i	
B.6.c.(1)		Intermitten	t	% heat input from TDF ranged from 4.44-9.9 % Incident report submitted on 5/3/12
B.6.c.(2)		<u>In</u>		recorded on General Utilities Fuel Distribution Report
page 19	<u> </u>			
C.1.c.(2)	<u> </u>	<u>In</u>	!	Package Boiler was not used during the reporting period.
page 20	i			
D.1.b.(4) D.1.c.(2)		in in		Recorded on #19 Air Emission Data Sheet Recorded on General Utilities Fuel Distribution Report
	i	"	<u> </u>	Recorded on General Collines Fide Distribution Report
page 21		r kewanawa		COMS daily reports; one 6 minute period of excess opacity on 4/19/12
D.2.a. D.1.c.(3)		Intermitten	i	Recorded on #19 Air Emission Data Sheet
D.1.c.(5)		ln ln	L	on file, ESP performance and rapper programs reviews; no changes made to programs
D.1.c.(6) D.1.c.(8)		ln I ln		Recorded on #19 Air Emission Data Sheet Recorded on #19 Air Emission Data Sheet
	Ţ <u>.</u>			
page 22 D.2.c.(2)	ļ	i In		Submitted 1st and 2nd Q 2012 EE Reports
D 3.b.(2)	-	in_		SO2 emissions ranged from 30.2- 228.4 lbs SO2/hr; 24 hr ave
D.3 (2)	<u>[</u>	ln ln	<u> </u>	No. 6 fuel oil ranged from 1.185 - 1.729 % S
page 24				
E.1.c.(2)		in .		Recorded on the MACT II CMS summary sheet
page 25				
E.3.c.(1)		ln .	<u> </u>	Recorded on MACT II CMS summary sheet
page 26	i		<u></u>	
E.4.b.(1) E.4.b.(2)	<u> </u>	in	i	Recorded on MACT II CMS summary sheet Recorded on MACT II CMS summary sheet
E.4.b.(2) E.4.b.(3)	 	ln In	† <u>†</u>	Recorded on MACT IF CMS summary sheet Recorded on MACT IF CMS summary sheet
			<u> </u>	
page 27 F.1.c.(2)	1	in	 	Recorded on Lime Kiln Report #22
	1		ļ	
page 28	 	ln .	<u> </u>	No. 6 fuel oil ranged from 1.185 - 1.729 % \$
	j	İn .	† · · - · · · ·	SO2 emissions ranged from 2.1 72 lbs SO2/hr 24 hr ave basis
F.3.a. F.3.b (1)				
	 	i	†	
page 29		l In		NOx emission rate ranged from 3.12-7.26 ibs./hr;24 hr ave
page 29 F.4.c.(2)		ln _		NOx emission rate ranged from 3.12-7.26 ibs./hr.24 hr ave
page 29 F.4.c.(2) page 30				
page 29 F.4.c.(2)		Intermitten	ı.	NOx emission rate ranged from 3.12-7.26 ibs /hr,24 hr ave see Appendix A TRS and O2 CEMS reports on file TRS ppmdv 12 hr block averages ranged from 0.04-3.42 ppmdv corrected to 10% O2

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### 3 1			
### 3 1			
	Permit Reference	Compliance (In or Out) Monitoring Range if applicable
7 P. 15 In Recorded on ILMPS ILMPS Annually Services and ILMPS Annually Services and ILMPS Annual Method 21 records on ILMPS (AN INTERLIGE) 982 33 In Recorded on ILMPS (AN INTERLIGE) 982 35 In Recorded on ILMPS (AN INTERLIGE) 982 34 In Recorded on ILMPS (AN INTERLIGE) 982 35 In Recorded on ILMPS (AN INTERLIGE) 982 36 In Recorded on morthly condensate validown checkless 983 36 In Recorded on morthly condensate validown checkless 983 36 In Recorded on morthly condensate validown checkless 984 37 In Recorded on ILMPS (AN INTERLIGE) 985 38 In Recorded on ILMPS (AN INTERLIGE) 985 38 In Recorded on ILMPS (AN INTERLIGE) 985 39 In Recorded on ILMPS (AN INTERLIGE) 985 30 In			Recorded on MACT II CMS summary sheet
	F.7.b.(3)		
According to the second of the			
Recorded on monthly NCG LVMC watedown sheetilets A CACCO In Recorded on monthly register on rise APP 34 A CACCO In Recorded on monthly condemnate validown checklists APP 34 A CACCO In Recorded on monthly condemnate validown checklists APP 34 A CACCO In Recorded on monthly condemnate validown checklists APP 34 A CACCO In Recorded on monthly condemnate validown checklists APP 34 A CACCO In Recorded on monthly condemnate validown checklists APP 34 A CACCO In Caccounted in Pricing APP 34 A CACCO In Caccounted in Pricing APP 34 A CACCO In Caccounted with 1st and 2nd 0 2012 EE Reports In Caccounted with 1st and 2nd 0 2012 EE Reports In Caccounted with 1st and 2nd 0 2012 EE Reports In Caccounted with 1st and 2nd 0 2012 EE Reports In Page 44 In Page 45	page 32		Donated at Land VIII TDS Log
	G.1.c.(2)		Recorded on Lime Kill TRS Log
	page 33		
Age 23	H.4.c.(2)	In In	
			Annual Method 21 reports on file
	page 34		
14 17	H.4.c.(3)	In	Recorded on monthly condensate walkdown checklists
14 17			
14.1.0 In			Any Ma Old process relevanted and undated appropriate Profice current value is 3031 ppm
99 35 4.4 (9) 1.			new Meon average calculated and updated annually in motory scanon value to see, pp.
Associated In	11.1.0.(0)		
1.4.0 (11) In	page 36		
	H.4.b.(9) i	in	calculated in Proficy
	page 37		
1.5.c (2) In	H.4.b.(11)	In	calculated in MACT reporting system; submitted with EE reports
15.6 (2)			
Paper Machine PM emission rates ranged from 33-00 bs.hr, monthly ave basis 33-00 bs.hr, monthly ave paper form 34-00 bs.hr, monthly	page 38	- In	submitted with 1st and 2nd Q 2012 EE Reports
Pager Machine PM emission rates ranged from	11.0.0.(2)		SUBMICE THAT TO GIVE SECTION OF THE CONTRACT O
33.6 @ los hr, monthly ave basis 33.6 @ los hr,	page 41		
Peper Machine size press VOC emissions: P11-316-93 lbs/mo P13-016 lbs/	K.1.c.(2)(b)		Paper Machine PM emission rates ranged from
Paper Machine size press VOC emissions: P11-316-93 balmo	220 42		.33-80 IDS./NF, MONTRIY AVE DASIS
P13-0 lbs./mo P14-772-1242 lbs./mo P15-0-192 lbs./mo P15-0		in in	
1.0.(2)			P13- 0 lbs./mo P14- 772-1242 lbs./mo P15- 0-182 lbs./mo
Bige 44	page 43		
P33 - VOC emission ranged from 30-53 lbs /mo P33 - VOC emission ranged from 30-53 lbs /mo P33 - REMOVED on 31/17/2 P33 - REMOVED P33 - REMOVED P33 - REMOVED P33 - REMOVED P34 - REMOVED P35 - REMOVED P3	L.1.c.(2)	NA -	P52 EXILIDER WAS REMOVED.
P33 - VOC emission ranged from 30-53 lbs /mo P33 - VOC emission ranged from 30-53 lbs /mo P33 - REMOVED on 31/17/2 P33 - REMOVED P33 - REMOVED P33 - REMOVED P33 - REMOVED P34 - REMOVED P35 - REMOVED P3	page 44		
Submitted 1st half 2012 Paper Coating MACT compliance report	L.2.c.(2) (d)	in i	P33- VOC emissions ranged from 30-53 lbs./mo
Submitted 1st haif 2012 Paper Coating MACT compliance report			P33 REMOVED on 3/1/1/2
3.3.c (4)	L 3 c (3)		Submitted 1st half 2012 Paper Coating MACT compliance report
Monthly ave PM emission rates ranged from P55- REMOVED	L.3.c.(4)		% monthly HAP content of coating applied ranged from .2836 % by wt.
Monthly ave PM emission rates ranged from P55- REMOVED			
1.3 a (3)		NA	i Monthly ave PM emission rates ranged from : P55- REMOVED
1.5 a. (5)	<u> </u>		P56- REMOVED P59-REMOVED
1.5 a. (5)			
1.5 a. (5)	page 47		- ID72 REMOVED
Max	M.3.a.(3) M.3.a.(5)		All poly extruders have been REMOVED
Age 48	M.3.a.(6)		Monthly VOC emission rates ranged from: P55- REMOVED; P59- 309-871 lbs./nionth; P76-REMOVED
A4 c(2)			
Mage 49		NA I	All flevo prosses have been REMOVED
NA	W 4.C (2)		Thi light presses for occurrences
Alge 50	page 49		
1.c.(1) In Log on file	M.5.c.(2)	NA NA	P72 has been REMOVED
1.c.(1) In Log on file	nage 50		
bage 55 No. 6 fuel oil ranged from 1 185 - 1 729 % S 0.5 b.(1) In 0.6 b.(1) In 1 tacility SO2 emissions ranges from 7001- 7681 tons SO2; 12 mo rolling ave basis 1 page 60 In 0.8 b.(4) In 1 page 62 In 0.8 b.(7) In 1 st and 2nd Q 2012 EE reports were submitted 0.8 b.(8) In MACT semiannual EE and CMS Performance report submitted 1 page 63 In 2 page 64 In 2 page 64 In 3 page 64 In 4 page 65 In 4 page 65 In 5 page 64 In 6 page 64 In 6 page 64 In 6 page 64 In 6 page 65 In 6 page 65 In 7 page 65 In 8 page 66 In 9 page 67 In 9 page 68 In 1 page 69 In 1 page 69 In </td <td>N 1.c.(1)</td> <td>in</td> <td>Log on filel</td>	N 1.c.(1)	in	Log on filel
10.5.b.(1) In	1		
10.6 to 10.6	page 55	<u> </u>	No. 6 fuel oil reproof from 1 185 - 1 729 % S
Dage 60			facility SO2 emissions ranges from 7001- 7681 tons SO2; 12 mo rolling ave basis
D.8.b.(4) In	0.0.5.(1)		
page 62 In 1st and 2nd Q 2012 EE reports were submitted D.8.b.(8) In MACT semiannual EE and CMS Performance report submitted page 63 In PM emission compliance stack test on No. 11 Boiler only was completed on 12/2/09. The average emission rate as .04 lbs PM/MMBTU page 64 In annual emission of selected HAPS are reported on the	page 60		
0.8 b.(7)	O.8.b.(4)	<u>ini</u> i	records on tile
0.8 b.(7)	page 62		
D.8.b.(8) In MACT semiannual EE and CMS Performance report submitted page 63 D.9.a. and b. In PM emission compliance stack test on No. 11 Boiler only was completed on 12/2/09. The average emission rate as .04 lbs PM/MMBTU page 64 D.10.b.(1) In annual emission of selected HAPS are reported on the	O.8 b.(7)		1st and 2nd Q 2012 EE reports were submitted
D.9.a. and b. In PM emission compliance stack test on No. 11 Boiler only was completed on 12/2/09. The average emission rate as .04 lbs .PM/MMBTU bage 64 D.10.b.(1) In annual emission of selected HAPS are reported on the	O.8.b.(8)	i In	MACT semiannual EE and CMS Performance report submitted
D.9.a. and b. In PM emission compliance stack test on No. 11 Boiler only was completed on 12/2/09. The average emission rate as .04 lbs .PM/MMBTU bage 64 D.10.b.(1) In annual emission of selected HAPS are reported on the	nage 63		
12/2/09. The average emission rate as .04 lbs PM/MMBTU page 64 D.10.b.(1) In annual emission of selected HAPS are reported on the		·	PM emission compliance stack test on No. 11 Boiler only was completed on
0.10.b.(1) In annual emission of selected HAPS are reported on the			12/2/09. The average emission rate as .04 lbs.PM/MMBTU
	page 64		and a mission of colored HAPS are reported to the
and it is the action of the control	O.10.b.(1)		
			ACTION CHRONOL TOTAL CO.

Appendix A

Permit Deviations and Excess Emissions for the Reporting Period January 1, 2012- June 30, 2012

Permit Reference	Deviation or Excess Emission
Page 18 B.6.a.	As previous reported on May 3, 2012, April 2012 TDF content in B09 and B11 was 9.9% on heat input basis.
Page 21 D.2.a.	There was one 6 minute period of excess opacity (25.9%) from S10 on 4/19/12 and previously reported in the 2 nd Q 2012 Excess Emissions Report.
Page 30 F.6.b.(1)	As previously reported on the quarterly excess emissions reports, The LVHC NCG collection and incineration system experienced the following vent time for the reporting period:
	33.0 minutes including SSM events or 0.01 % of the operating time. There were a total of 29 vents.